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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OUMOU BAH, AS THE ADMINISTRATOR OF THE ESTATE OF MOHAMED BAH,

Civil Action No. 13 cv 6690 (PKC)(KNF)

Plaintiff,

VS.

STIPULATION

THE CITY OF NEW YORK, and POLICE OFFICERS JOHN DOES 1-50

Defendants.

Pursuant to the Initial Pre-Trial Conference on November 19, 2013, the parties stipulate that Defendant will produce, via electronic mail to Plaintiff, the following documents on or before November 22, 2013:

- (1) The shooting investigation report in counsel's possession; and
- (2) All Emergency Service Unit ("ESU") Reports in counsel's possession.

The parties further stipulate that Defendant will make a good faith effort to produce, via electronic mail to Plaintiff, the following documents on or before November 27, 2013. If after a good faith effort, Defendant is unable to produce any of the following documents by November 27, 2013, Defendant shall immediately advise Plaintiff when Defendant expects such documents will be produced.

- (1) Any and all UF-49 Incident Reports;
- (2) Any and all Crime Scene Unit Reports;
- (3) Any and all Taser or camera videos;
- (4) Any and all Sprint Reports and/or Dispatch Reports;
- (5) DD-5 Reports; and

(6) Any and all 911 tapes/recordings.

Plaintiff reserves the right to move to compel production of any of the above-named documents if not produced. It is further stipulated that the documents produced pursuant to this stipulation, and information contained therein, will be treated on an attorneys' eyes only basis until the close of the grand jury presentation by the New York County District Attorney's Office. This stipulation does not relieve Defendant of its obligation to respond to Plaintiff's First Request for the Production of Documents and Plaintiff's First Set of Interrogatories on or before December 1, 2013.

DATED:

New York, New York November 22, 2013

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SO ORDERED, this day of _____, 2013.

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